

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Michael Alan SAROS

Case: 2:25-mj-30205

Assigned To : Unassigned

Case No.

Assign. Date : 4/3/2025

Description: CMP USA V. SEALED
(DJ)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 1, 2024 to April 2, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2252A(a)(2)

18 U.S.C. § 2252A(a)(5)(B)

Distribution and receipt of child pornography

Possession of child pornography

This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Erin Herrgott, Special Agent (HSI)

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: April 3, 2025

City and state: Detroit, Michigan


Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Erin Herrgott, being first duly sworn, state as follows:

1. I am a Special Agent with Homeland Security Investigations (HSI), of the United States Department of Homeland Security (DHS). I have been employed as a Special Agent for HSI since August 2020. I successfully completed the Criminal Investigator Training Program (CITP) and the HSI Special Agent Training (HSISAT) at the Federal Law Enforcement Training Center (FLETC) in Glynco, GA. Prior to joining HSI, I was a Border Patrol Agent (BPA) with the United States Border Patrol (USBP) in Eagle Pass, Texas. Additionally, I have received a bachelor's degree in criminal justice from Madonna University. While employed at HSI, I have investigated federal criminal violations related to child sex trafficking, child exploitation, and child pornography. I have received training on child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Michael Alan SAROS for violations of 18 U.S.C. § 2252A(a)(2) (distribution and receipt of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by other law enforcement professionals. These facts are provided for the sole purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant; therefore, this affidavit does not necessarily contain all information uncovered during this investigation. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for SAROS.

4. During an HSI investigation regarding child exploitation and child pornography offenses in the Eastern District of Michigan, agents reviewed a cell phone belonging to an individual whose identity is known to law enforcement (Subject-3). Agents found chats on an internet-based messaging application between Subject-3 and an individual using the name "John Smith." Within the chat, "John Smith" identified another cell phone number for himself, which based on an administrative subpoena return, listed Michael SAROS as the subscriber. Also in the chat, SAROS provided Subject-3 with his home address in the Eastern District of Michigan multiple times. The address provided is consistent with law enforcement database queries on SAROS and his residence.

5. SAROS is a registered sex offender, who was previously convicted in the Eastern District of Michigan for distribution and possession of child pornography. In that case, law enforcement found more than 13,000 images and 300 videos of child pornography on SAROS's computer, including depictions of infants and children under the age of 12, bondage, bestiality, and violence. SAROS was sentenced in July 2011 to 80 months' imprisonment and 10 years of supervised release. SAROS began his term of supervised release in July 2016.

6. SAROS has violated his conditions of supervised release on multiple occasions since then. For example, in a June 2017 interview, SAROS admitted that he viewed child pornography on multiple occasions using an internet-capable phone given to him by a friend, had sex with a 17-year-old that he met online on two separate occasions, and exchanged nude images with minors on an unapproved cell phone. SAROS was sentenced to nine months' imprisonment and five years of further supervised release. SAROS is currently on supervised release.

7. The U.S. Probation Department provided HSI agents with the cell phone number for SAROS's device that is being monitored by the Probation Department, and it is the same phone number SAROS provided to Subject-3.

8. Review of the chats between SAROS and Subject-3 show that they discussed their shared sexual interest in children, and SAROS also referenced having access to two minor children: a 17-year-old and a 13-year-old. For instance:

June 6, 2024

Subject-3: Do you have him with you?

SAROS: I wish. I'd be all over that 😈😈

SAROS: So how crazy you get? You seen my porn... i wanna talk dirty with you...see how dark you get 😈

June 7, 2024

Subject-3: So dark i sould be put away for a long time.

SAROS: You and me both. Muhahaha! I'd love to torture a kid... beat my dick to his screams. Use him to get to his little brother. Fuck his headless corpse and make him watch. Let him know he's next

Subject-3 🙈 *reacted to message*

Subject-3: That's one of the most romantic things iv heard in a while. I just got off earlier to a screaming unwilling kid.

SAROS: Fuck yea

9. Throughout the conversation, SAROS and Subject-3 appeared to forward multiple media files to one another. Law enforcement is currently unable to view the content of these media files on Subject-3's cell phone. However, some of the files are accompanied by captions suggestive of content involving minors. On August 30, 2024, for example, Subject-3 forwarded media with the caption: "This is me blowing meth clouds and sucking off a 12yo i hired, with his dad. not that hard."

10. Based on this and other information, I obtained federal search warrants for SAROS, his residence, and his vehicle, which were executed on April 2, 2025. At the search warrant execution, HSI agents encountered SAROS and one other

adult. During the search, HSI agents located multiple cell phones and other electronic devices. Agents located a blue Nokia G310 cell phone that was found in the bathroom of the residence. SAROS did not claim ownership of the device. However, an initial review of the device's contents revealed the same conversation between Subject-3 and "John Smith", referenced in Paragraph 4 of this affidavit.

11. Further review of the contents of the Nokia phone revealed that SAROS was in possession of files that meet the federal definition of child pornography. For instance, within the Google Movies folder on the cell phone, law enforcement observed the videos described below. All three videos appear to have been downloaded from another internet-based messaging platform.

a. A video approximately 4 minutes and 41 seconds in length, with associated metadata that appears to indicate that it was downloaded on March 24, 2025, at approximately 4:57 A.M. The video shows a prepubescent male naked from the waist down. An adult male performs oral sex on the child.

b. A video approximately 20 seconds in length, with associated metadata that appears to indicate that it was downloaded on January 25, 2025, at approximately 12:44 A.M. The video shows a prepubescent male naked from the waist down. The child is anally penetrated by an adult male penis.

c. A video approximately 37 seconds in length, with associated metadata that appears to indicate that it was downloaded on January 14, 2025,

at approximately 12:38 A.M. The video shows a naked prepubescent male who is being anally penetrated by an adult male penis. Simultaneously, the child is orally penetrated by an adult male penis.

12. Review of SAROS's device also revealed that SAROS sent at least one file of child pornography to Subject-3 via their chat on the internet-based messaging application on September 1, 2024:

a. An image of a naked prepubescent male being anally penetrated by an adult male penis. There is text on the image which reads: "CAN'T STOP LOOKING AT CHILD PORN? IT IS ESTIMATED THAT 3% OF THE EARTH'S POPULATION ARE PEDOPHILES THAT'S 225 MILLION CHILD LOVERS WORLDWIDE YOU'RE NOT ALONE."

13. Based on the information above, there is probable cause to believe that SAROS violated 18 U.S.C. § 2252A(a)(2) (distribution and receipt of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

14. Wherefore by this affidavit and application, I request that the Court authorize the issuance of a criminal complaint and arrest warrant for SAROS.

Respectfully submitted,


Erin Herrgott, Special Agent
Homeland Security Investigations

Sworn to before me and signed in my presence
and/or by reliable electronic means.

A handwritten signature in black ink, appearing to read "Kim G. Altman", written in a cursive style.

Hon. Kimberly G. Altman
United States Magistrate Judge

April 3, 2025